

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**PUGET SOUND AND PACIFIC  
RAILROAD,**

**Petitioner,**

**v.**

**GRAYS HARBOR COUNTY,**

**Respondent**

.....  
**PUGET SOUND AND PACIFIC  
RAILROAD,**

**Petitioner,**

**v.**

**CITY OF ELMA,**

**Respondent**

**DOCKET TR-110157  
DOCKET TR-110162**

**DOCKET TR-110159  
DOCKET TR-110160  
DOCKET TR-110161**

**TESTIMONY OF**

**RONALD H. MERILA**

**STAFF ENGINEER  
FOR  
GRAYS HARBOR COUNTY**

**November 8, 2011**

## TABLE OF CONTENTS

I.	WITNESS QUALIFICATIONS AND EXPERIENCE.....	1
II.	SUMMARY OF TESTIMONY .....	2
III.	DESCRIPTION OF THE COUNTY CROSSING SITES .....	3
IV.	REVIEW OF THE COUNTY CROSSING SITES.....	4

## EXHIBIT LIST

- Exhibit No. \_\_\_\_ (RHM-2) USDOT Highway-Railroad Grade Crossings: A Guide to Crossing Consolidation and Closure (July 1994)
- Exhibit No. \_\_\_\_ (RHM-3) 2009 aerial photograph of the Hewitt Street and the Monte-Elma/Foss/Ash Avenue crossings in Satsop
- Exhibit No. \_\_\_\_ (RHM-4) Aerial photograph of the 13<sup>th</sup> Street and the 17<sup>th</sup> Street crossings

1                   **I.       WITNESS QUALIFICATIONS AND EXPERIENCE**

2

3   **Q.     Please state your name and business address.**

4   A.     My name is Ronald H. Merila. The business address for my employer Grays Harbor  
5           County is 100 West Broadway Avenue, Suite 31, Montesano, Washington 98563-  
6           3614.

7

8   **Q.     Where do you work?**

9   A.     I work for Grays Harbor County (“the County”).

10

11 **Q.     How long have you worked for the County?**

12 A.     I have worked for the County since 2002.

13

14 **Q.     What is your current title?**

15 A.     I am the Deputy Director for Traffic and Planning in the Public Works Division of  
16 the County Department of Public Services.

17

18 **Q.     What is your work history?**

19 A.     I began work for the City of Aberdeen, Washington, in 1971. In 1973 I became  
20 Assistant City Engineer, and from 1988 to 2002 I was the Aberdeen City Engineer. I  
21 retired as City Engineer in 2002 and later that year I joined the County on a part-time  
22 basis as Deputy Director for Traffic and Planning.

23

1 **Q. What is your professional training?**

2 A. I received a Bachelor of Science (BS) Degree in Civil Engineering in June 1971  
3 from the University of Washington. I am a licensed civil engineer in the State of  
4 Washington.

5

6 **Q. How does your experience directly apply to this docket?**

7 A. My experience as an engineer with both the City of Aberdeen and the County gives  
8 me familiarity with proper design and function of road traffic crossings, including  
9 crossings involving train-motor vehicle traffic. During my work for the City of  
10 Aberdeen I worked with Burlington Northern Railroad on a project that relocated its  
11 track approximately 16 feet southward through east Aberdeen to accommodate  
12 installation of left turn traffic lanes for access into the Wishkah Mall area (now  
13 renamed Gateway Plaza), which involved several at-grade crossings, both active and  
14 passive. I supervised a number of road projects that involved at-grade railroad  
15 crossings as City Engineer and my present position with Grays Harbor County.

16

17 **II. SUMMARY OF TESTIMONY**

18

19 **Q. What is the purpose of your testimony?**

20 A. The purpose of my testimony is to make a recommendation on the two petitions filed  
21 by Puget Sound and Pacific Railroad (PSAP) with respect to their request to close  
22 two at-grade railroad crossings at Hewitt Street (TR-110157), and North 17<sup>th</sup> Street  
23 (TR-11062).

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**Q. Would you please summarize your recommendation?**

A. I recommend that PSAP's petitions to close the Hewitt Street (TR-110157) and North 17<sup>th</sup> Street (TR-11062) crossings be denied.

**III. DESCRIPTION OF THE CROSSING SITES**

**Q. What does the Petitioner propose to do?**

A. According to the petitions PSAP filed in these consolidated dockets, it proposes to close the grade crossings at the intersection of Hewitt Street in Grays Harbor County identified as USDOT Crossing No. 096649C, and at the intersection of North 17<sup>th</sup> Street in Grays Harbor County identified as USDOT Crossing No. 096649C.

**Q. Are you familiar with the location of the proposed crossing closures located in the County at Hewitt and North 17<sup>th</sup> Streets, and with the physical characteristics of each crossing location and surrounding area?**

A. Yes. Both the Hewitt Street and Foss Avenue/Monte-Elma Road crossing locations are shown in Exhibit No. \_\_\_\_ (RM-3), which are 2009 aerial views of those locations. There are also several exhibits that have been submitted by PSAP, which show each crossing location and surrounding area. See Exhibit No. \_\_\_\_ (PK-15), which is an aerial view showing the location of the proposed crossing closure at North 17<sup>th</sup> Street and the surrounding area. See also Exhibit Nos. \_\_\_\_ (PK-16.1 to PK-16.5), which are photographs showing approaches to the North 17<sup>th</sup> Street

1 crossing and the surrounding area. An aerial view showing the Hewitt Street, as well  
2 as the Foss/Ash Road crossings is filed by PSAP as Exhibit No. \_\_\_\_ (PK-18) and  
3 photographs showing approaches to the Hewitt Street crossing and surrounding area  
4 are filed as Exhibit Nos. \_\_\_\_ (PK-19.1 to PK-19.4). Lastly, Exhibit Nos. \_\_\_\_  
5 (PK-20.1 to PK-20.5) are photographs showing approaches to the Foss/Ash crossings  
6 and the surrounding area. These exhibits were submitted to the County on  
7 September 16, 2011 by PSAP.

8  
9 **IV. REVIEW OF THE COUNTY CROSSING SITES**

10  
11 **Q. Have you visited the Hewitt Street and N. 17<sup>th</sup> Street locations at issue in this**  
12 **case?**

13 A. Yes, on several occasions.

14  
15 **Q. Did you review other materials in analyzing the proposal in this docket?**

16 A. Yes.

17  
18 **Q. What were those?**

19 A. I reviewed the testimony of Cary Stewart and a document he prepared containing his  
20 analysis of proposed railroad crossing closures dated September 9, 2011. Exhibit  
21 No. \_\_\_\_ (CS-3) is a copy of that document. I have also reviewed the *USDOT*  
22 *Secretary of Transportation's Action Plan on Highway-Rail Crossing Safety and*  
23 *Trespass Prevention*, filed as Exhibit No. \_\_\_\_ (PK-3) with Patrick Kerr's testimony,

1 and the *USDOT Railroad-Highway Grade Crossing Handbook*, filed as Exhibit No.  
2 \_\_\_\_ (PK-4) with Patrick Kerr's testimony. I have also reviewed *USDOT Highway-*  
3 *Railroad Grade Crossings: A Guide to Crossing Consolidation and Closure (July*  
4 *1994)*, submitted as Exhibit No. \_\_\_\_ (RM-2).

5  
6 **Q. Do you agree with his analysis in this document?**

7 A. Mr. Stewart includes analysis of highway traffic counts in his analysis, but I don't  
8 believe the relatively low traffic volumes speak to other closure issues that are  
9 critical to crossing closure considerations in these cases. His analysis fails to  
10 mention any impacts of train blockages on the North 17<sup>th</sup> Street crossing and other  
11 crossings within Elma City limits, the lack of proper turning radius for the 150  
12 degree turn for west-bound traffic at the Foss/Monte-Elma Road crossing alternative  
13 to the Hewitt Street crossing, and any accident history at alternative crossings. There  
14 is also no discussion of points against crossing closure with respect to any of the  
15 proposed crossing closures in these dockets. See Exhibit No. \_\_\_\_ (RM-2), at 8. I do  
16 not believe the closure of the railroad crossings at N. 17<sup>th</sup> Street and Hewitt Street  
17 will necessarily result in safer conditions than presently exists with respect to public  
18 travel or emergency response.

19  
20 **Q. What factors are not considered in Mr. Stewart's analysis of potential closure of**  
21 **the Hewitt Street and N. 17<sup>th</sup> Street railroad crossings?**

22 A. First, there is no mention of frequent train stoppages and "train-building" that block  
23 public traffic access simultaneously over several crossings, including those at N. 3<sup>rd</sup>

1 Street, N. 6<sup>th</sup> Street, N. 11<sup>th</sup> Street, and N. 13<sup>th</sup> Street in the City of Elma. PSAP uses  
2 its track through these crossing locations to build trains, resulting in train stoppages  
3 blocking crossings anywhere from a few minutes to up to forty (40) minutes on  
4 occasion. Mr. Stewart's analysis mentions "shortest current route and longest  
5 potential route," but he does not identify what those routes are nor does he discuss  
6 the impact of having most or all of those routes blocked for substantial lengths of  
7 time during train stoppages. See Exhibit No. \_\_\_\_ (CS-3), at pages 6-7. Second,  
8 there is no discussion of the impact of closing the Hewitt Street crossing by diverting  
9 traffic to the Foss Avenue crossing at Monte-Elma Road, which has an extremely  
10 sharp turning angle that makes access by large commercial vehicles or fire trucks  
11 difficult and more hazardous, as well as more time-consuming. Access by school  
12 buses over this alternative Foss Avenue crossing will also be problematic given the  
13 sharp turning radius at that intersection. Finally, there will be economic impact to  
14 the community at large through the increase in driving and/or waiting time caused by  
15 these crossing closures and continued train blockages of remaining crossings.

16

17 **Q. Do you agree with the Level of Service (LOS) and traffic flow analysis**  
18 **submitted by PSAP?**

19 A. I agree that both Hewitt and N. 17<sup>th</sup> Streets have relatively low daily traffic volumes,  
20 but County records show higher average daily traffic counts (ADT) at Hewitt Street  
21 than is presented by Mr. Stewart's analysis. For example, the Hewitt Street crossing  
22 ADT in July 1994 was 203 vehicles per day. While not specific to the railroad  
23 crossing location itself, other ADT counts for Hewitt Street over the years are as



1 follows: 252 (1976); 195 (10/1980); 163 (11/1984); 131 (09/1987); and 163  
2 (06/2001). During these same time periods, traffic counts at Foss Avenue were 146  
3 (1976); 45 (10/1980); 35 (11/1984); 34 (10/1987); and 39 (06/2001). Regardless that  
4 these traffic counts differ, I do agree that traffic counts for both Monte-Elma Road  
5 (Foss Ave) and N. 13<sup>th</sup> Street alternate crossing locations would be within acceptable  
6 level of service capacities should the Hewitt Street and N. 17<sup>th</sup> Street crossings be  
7 closed, however, the negative impact of the extreme turning angle at the Monte-Elma  
8 Road (Foss Ave) crossing on school bus, commercial vehicle, fire and emergency  
9 vehicle access will remain.

10  
11 **Q. How does the proposed crossing closure at Hewitt Street impact public necessity**  
12 **and convenience?**

13 A. First, closing the Hewitt Street crossing will result in only one remaining crossing  
14 allowing ingress/egress from Monte-Elma Road to the residential area lying north of  
15 Monte-Elma Road, which will require both vehicular and pedestrian traffic to detour  
16 farther from businesses and the school in Satsop. Closing the Hewitt Street crossing  
17 will also require the traveling public, fire and emergency vehicles to detour to the  
18 residential area lying north of this crossing using the crossing at Foss  
19 Avenue/Monte-Elma Road that has a very sharp turning angle. This residential area  
20 is not accessible through another crossing if the Hewitt Street crossing is closed and,  
21 since both crossings are only about 660 feet apart, it is likely any train stoppage at  
22 the Monte-Elma Road crossing will totally block all vehicular access to these homes.  
23 Given the sharp turning angle of the only other available crossing at Monte-Elma

1 Road and the difficulty in its utilization by larger fire apparatus, it seems evident that  
2 the Hewitt Street crossing, which is at right angles to the track, is the one utilized by  
3 emergency fire vehicles traveling to a structure lying north of this crossing. It should  
4 be noted that the United States Department of Transportation Railroad-Highway  
5 Grade Crossing Handbook states that Crossings frequently utilized by emergency  
6 vehicles should not be closed.” See Exhibit No. \_\_\_\_ (PK-4), at page 79. My  
7 experience working with the Aberdeen Fire Department as Aberdeen City Engineer  
8 is that a structure can be fully enveloped on fire within one minute of an alarm.  
9 Closure of the Hewitt Street crossing and diverting emergency fire equipment to the  
10 Foss Avenue/Monte-Elma Road crossing with its inadequate turning radius will  
11 create fire response delays that will hazard public safety and property.

12

13 **Q. How does the proposed crossing closure at N. 17<sup>th</sup> Street impact public necessity**  
14 **and convenience?**

15 A. Closing the N. 17<sup>th</sup> Street crossing will require the public to use alternate crossings  
16 that have shown to be often blocked in Elma due to train building by PSAP, which  
17 results in train stoppages for a few minutes up to a reported forty minutes at a time.  
18 The PSAP has not submitted future assurances that several Elma crossings may be  
19 blocked for significant periods of time if closure of 17<sup>th</sup> Street occurs, resulting in  
20 splitting Elma community access in half. See Exhibit No. \_\_\_\_ (RHM-2), at page 8.

21

22

1 **Q. Are there mitigation steps that must be made to the Monte-Elma Road (Foss**  
2 **Avenue) crossing to reduce or eliminate safety and access concerns?**

3 A. Yes, there are.

4

5 **Q. Please explain what mitigation steps are needed.**

6 A. Because of the sharp turning angle at the Monte-Elma Road crossing, movement of  
7 large commercial vehicles and fire equipment trucks over that crossing will be  
8 hazardous and difficult without substantial design changes to that crossing to make it  
9 safer to move large vehicles, both commercial and fire, through it. Implementing  
10 mitigation steps for the Foss Avenue/Monte-Elma Road crossing if the Hewitt Street  
11 crossing is closed will at least facilitate safer access for large fire apparatus and  
12 commercial trucks, and reduce fire and emergency response time to the residential  
13 area north of the Hewitt Street crossing.

14

15 **Q. Are there factors that influence the level of safety at a crossing?**

16 A. Yes.

17

18 **Q. What are those factors?**

19 A. The type of warning given to motorists approaching the crossing is one factor. It  
20 may be either a passive or active warning device. The angle of approach is another,  
21 with perpendicular approach being preferred. Sight distance is important, assuring  
22 that vegetation or structures do not obscure visibility. Accident history at the  
23 crossing is another factor.

1

2 **Q. Is there any accident history at the Hewitt Street or N. 17<sup>th</sup> Street crossing sites?**

3 A. No. The County has no record of vehicle-train collisions at either crossing. Neither  
4 does the County have any record of reported non-train accidents at the Hewitt Street  
5 nor N. 17<sup>th</sup> Street crossings.

6

7 **Q. Does this conclude your testimony?**

8 A. Yes.

9